

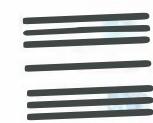
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TRACKSURE INSURANCE AGENCY, INC.
Attn: Laurie J. Harris
2677 N MAIN ST STE 600
SANTA ANA CA 92705-6629



404.990.3388 p.
470.357.6011 f.
jflack@theyorkfirm.com

1776 Briarcliff Road NE | Suite 200
Atlanta, Georgia 30306
www.theyorkfirm.com

August 23, 2022

Via certified mail with return receipt
Article Nos. 7018 0360 0000 7476 1804
7017 1070 0000 8588 1063
7017 1070 0000 8588 1070

Sedgwick Claims Management Services, Inc.
Attn: Kendrick Conklin
PO Box 14155
Lexington, KY 40512

Reliable Lloyd's Insurance Company
11222 Quail Roost Drive
Miami, FL 33157

TrackSure Insurance Agency, Inc.
Attn: Laurie J. Harris
2677 N. Main Street, Suite 600
Santa Ana, CA 92705

Re:	My client:	Aravind Ramachandran
	Your insured:	HyreCar, Inc.
	Date of Incident:	10/08/2021
	Claim Number:	C166075949-0003-01/FAR3381010
	Case Number:	Fulton County State Court, 22EV003604

Dear Mr. Conklin, Sedgwick Claims Insurance, Reliable Lloyd's Insurance Company:

Pursuant to O.C.G.A. § 33-7-15(c), I have enclosed the following documents:

1. Complaint for Damages
2. Summons of Mark A. Smith
3. Plaintiff's First Request for Production of Documents to Defendant
4. Plaintiff's First Interrogatories to Defendant
5. Plaintiff's First Request for Admissions to Defendant

Please feel free to contact me if you have any questions. Thank you.

Sincerely,



Jonathan D. Flack

Enclosures

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

ARAVIND RAMACHANDRAN

Plaintiff,

v.

MARK A. SMITH

Defendant.

Case No.

Complaint for Damages

Parties, Jurisdiction, and Venue

1. Plaintiff Aravind Ramachandran is a resident of Georgia.
2. Defendant Mark Smith is a resident of Fulton County.
3. Defendant Smith can be served with process at his residence, located at 2602 Peachtree Park Drive NE, Atlanta, Georgia 30309.
4. Defendant Smith is subject to the jurisdiction of this Court.
5. Venue is proper in this Court.

Facts and Background

6. On October 8, 2021, at 1:30 a.m., Mr. Ramachandran was driving a Honda Civic Northbound on Georgia 400 near Lenox Road.
7. At that same time, Defendant Mark Smith was driving a Jeep Cherokee Southbound on Georgia 400 North—the wrong direction of travel.
8. Defendant was traveling approximately 70 miles-per-hour.
9. Defendant drove his vehicle head-on into the vehicle driven by Mr. Ramachandran, causing a head-on collision at high speed (“the Crash”).
10. As a result of the impact from the Crash, Mr. Ramachandran suffered serious injuries.

11. At all relevant times, Mr. Ramachandran exercised due care for his own safety.
12. The Jeep Cherokee Defendant was driving was a rental vehicle he rented from AmeriDrive Holdings, Inc.

Negligence of Defendant

13. Defendant owed a duty of care to the motoring public in general, and to Mr. Ramachandran in particular, to operate his vehicle in a reasonable and prudent manner and to adhere to the Rules of the Road for the State of Georgia.
14. Defendant breached his duty of care and was negligent by driving on the wrong side of the road, speeding, driving recklessly, failing to maintain a proper lookout, failing to follow traffic control signs, operating a motor vehicle while distracted, among other acts of negligence.
15. Defendant's actions constituted negligence *per se* by violating applicable laws and regulations including, but not limited to: O.C.G.A. § 40-6-180, O.C.G.A. § 40-6-241, and O.C.G.A. § 40-6-390.
16. The acts and omissions of Defendant Smith, including but not limited to the above-stated breaches of his duty of care and violations of applicable laws and regulations, were a cause-in-fact and the proximate cause of Mr. Ramachandran's injuries and damages.
17. The Crash was directly and proximately caused by the negligence of Defendant Smith.

Attorney's Fees

18. Mr. Ramachandran is entitled to attorney fees pursuant to O.C.G.A. § 13-6-11 because Defendant has acted in bad faith, been stubbornly litigious, and caused Mr. Ramachandran unnecessary trouble and expense.

Damages

19. Mr. Ramachandran is entitled to recover all elements of damages allowed under Georgia law.

20. Defendant is liable for Mr. Ramachandran's injuries and damages, pain and suffering, and all other elements of damages allowed under the laws of the State of Georgia.
21. To date, Mr. Ramachandran has incurred reasonable and necessary medical treatment expenses in excess of \$1,481,000 to date as a result of Defendant's negligence, the precise amount to be proven at trial.
22. Mr. Ramachandran seeks and is entitled to recover damages for:
 - 22.1. personal injuries;
 - 22.2. past, present, and future pain and suffering;
 - 22.3. disability;
 - 22.4. disfigurement;
 - 22.5. mental anguish;
 - 22.6. loss of capacity for the enjoyment of life;
 - 22.7. economic losses;
 - 22.8. incidental expenses;
 - 22.9. past, present, and future medical expenses, the precise amount to be proven at trial;
 - 22.10. lost earnings;
 - 22.11. loss of earning capacity;
 - 22.12. permanent injuries; and
 - 22.13. consequential damages to be proven at trial.
23. Mr. Ramachandran is entitled to an award of punitive damages as determined by the enlightened conscious of an impartial jury, because, among possibly other reasons which may be shown through discovery, the actions of Defendant indicate a pattern of dangerous driving which constitutes willful misconduct, wantonness, and displays an entire want of care which would

raise the presumption of conscious indifference to the consequences.

Prayer for Relief

24. Plaintiff respectfully requests and prays for the following relief:

- 24.1. process issue as provided by law;
- 24.2. trial by jury against Defendant;
- 24.3. judgment be awarded to Plaintiff and against Defendant;
- 24.4. Plaintiff be awarded damages in amounts to be shown at trial;
- 24.5. Plaintiff be awarded his attorney's fees due to Defendant's stubborn and litigious actions; and
- 24.6. Plaintiff have such other relief as this Court deems just and appropriate.

Submitted on June 29, 2022, by:

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Arthur R. York
Georgia Bar No. 204065
Jonathan D. Flack
Georgia Bar No. 111906
Attorneys for Plaintiff

GEORGIA, FULTON COUNTY

STATE COURT OF FULTON COUNTY
Civil Division

DO NOT WRITE IN THIS SPACE

CIVIL ACTION FILE #: _____

ARAVIND RAMACHANDRAN

Plaintiff's Name, Address, City, State, Zip Code

vs.

MARK SMITH

Defendant's Name, Address, City, State, Zip Code

<u>TYPE OF SUIT</u>	<u>AMOUNT OF SUIT</u>
[] ACCOUNT	PRINCIPAL \$ <u>1,481,000+</u>
[] CONTRACT	INTEREST \$ _____
[] NOTE	ATTY. FEES \$ _____
[] TORT	COURT COST \$ _____
[] PERSONAL INJURY	*****
[] FOREIGN JUDGMENT	
[] TROVER	
[] SPECIAL LIEN	
[] NEW FILING	
[] RE-FILING: PREVIOUS CASE NO. _____	

SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Jonathan D. FlackAddress: 1776 Briarcliff Rd. NE, Suite 200City, State, Zip Code: Atlanta, Georgia 30306Phone No.: 404-990-3388

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

SERVICE INFORMATION:

Served, this _____ day of _____, 20 _____. _____

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for _____

This _____ day of _____, 20 _____. _____ Foreperson

(STAPLE TO FRONT OF COMPLAINT)